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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

XAVIER AND PAULA DONALDSON
O/B/O X.D., a Minor,

Plaintiff,
v.

THE MONTCLAIR PUBLIC SCHOOL
DISTRICT, GAYLE MURPHY, Individually;
JOHN and JANE DOES 1-10 (fictitious
names);

Defendants

Civil Action No. 2:20-cv-07445-KM-ESK

AFFIDAVIT

I, Robert L. Tarver, Jr., Esq., as attorney for Plaintiffs, Xavier and Paula Donaldson, as parents and legal guardians of X.D., being duly sworn, upon my oath, depose and say:

1. I hereby offer the within Affidavit to support Plaintiffs' Motion to Approve the Settlement in the above captioned matter.

2. After extensive negotiations, a settlement was reached between the parties and an agreement was drafted, reviewed, and signed by the parties and their authorized representatives.

3. The financial terms of the settlement are set forth in the Settlement Agreement which has been filed with this Court as a redacted document in accordance with the parties Confidentiality clause.

4. Attorney's fees in this matter represent a reduced contingency fee agreed upon by the Plaintiffs and their attorney. All expenses in this matter have been borne by plaintiffs' attorney.

5. No surety bond is required as there are no funds under this agreement that are being held by Xavier and Paula Donaldson on behalf of X.D., the minor child.

6. Plaintiffs Xavier and Paula Donaldson respectfully request that this Court approve the settlement between the parties as a result of negotiations arrived at freely and voluntarily without duress or coercion.

Pursuant to 28 U.S.C. §1746, I certify under penalty of perjury that the foregoing is true and accurate. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/Robert L. Tarver, Jr.
ROBERT L. TARVER, JR., ESQ.

Dated: June 9, 2022